

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

VS.

EIMER MEDINA-RUIZ § **CRIMINAL NO: 4:07-CR-00065**
MYRA LORENA ORELLANA-MORALES §
JOEL HERNALDO PAREDES-GOMEZ §
AURELIO MOSQUERA §
AURORA RUIZ §
JOHN ALEX MARROQUIN-PATINO §

**DEFENDANTS' JOINT
UNOPPOSED MOTION FOR CONTINUANCE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, JOEL HERNALDO PAREDES-GOMEZ, et al, by and through his attorney of record WENDELL A. ODOM, JR., and would request this honorable Court grant a continuance in this cause and for grounds thereof would show the Court the following:

I

The case is set for jury selection and trial on Monday, November 16, 2009 at 8:00 a.m. and the final pre-trial conference is set for Monday, November 6, 2009, at 10:00 a.m.

II

Counsel would show that this case is a complex multiple division and multiple district case involving Conspiracy to Distribute for the Purpose of Unlawful Importation of More than 5 Kilograms of Cocaine and Distribution for Purpose of Unlawful Importation of Cocaine in violation of U.S.C. 21 § 959 (a) 960, 9 and 18.

III

Defendants in this case respectfully request a continuance in that five of six Defendants are now in custody. Defendants' Ruiz and Mosquero have new counsel. One Defendant has a related case in another jurisdiction and the other two Defendants have been working with the government in order to resolve this case short of trial.

The Defendants respectfully request that this Court grant an extension for the aforementioned reasons and would show that the ends of justice would best be served by the granting of such continuance and that the granting of such continuance outweighs the best interest of the public and the Defendant to a speedy trial pursuant to Title 18 U.S.G.C., Section 3161(h)(8)(A).

IV

Counsel has spoken with the Assistant United States Attorney in this cause, James Sturgis, and he has no objection to this request.

V

This motion is made in the interest of justice and not for the purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests this honorable Court to grant this **Unopposed Motion for Continuance** and reschedule this case until January of 2010.

Respectfully submitted,

/S/ Wendell A. Odom, Jr.
WENDELL A. ODOM, JR.
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Unopposed Motion for Continuance** was filed electronically with the United States District Court Clerk and same was electronically forwarded to the Assistant United States Attorney as well as to counsel as identified below on this the 29th day of October, 2009:

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/S/ Wendell A. Odom, Jr.
WENDELL A. ODOM, JR.

CERTIFICATE OF CONFERENCE

Counsel for Defendant has spoken to the Assistant United States Attorney in this cause, James H. Sturgis, and he has no objection to a continuance.

/S/ Wendell A. Odom, Jr.
WENDELL A. ODOM, JR.